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February 26, 2009

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

Re: **Reliance Communications, Inc. CPNI Certification**  
**EB Docket No. 06-36**

Dear Ms. Dortch:

As required under Section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e), and Public Notice, DA 09-9, please find enclosed a certificate of compliance with the Commission's Customer Proprietary Network Information regulations submitted on behalf of Reliance Communications, Inc. ("RCI") and signed by RCI's Executive Vice President.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Petra A. Vorwig

*Counsel for Reliance Communications, Inc.*

Encl.

cc: Enforcement Bureau – Telecommunications Consumers Division (two copies)  
Best Copy and Printing, Inc. (one copy via email)

**Annual 47 C.F.R. § 64.2009(e) CPNI Certificate**

**EB Docket No. 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 26, 2009

Name of company covered by this certification: Reliance Communications, Inc.

Form 499 Filer ID: 823168

Name of signatory: Michael Sauer

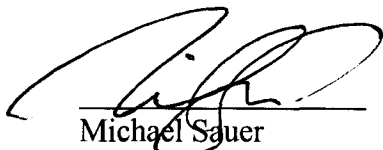
Title of signatory: Executive Vice President

I, Michael Sauer, certify that I am the Executive Vice President for Reliance Communications, Inc. ("RCI") and, acting as an agent of RCI, that I have personal knowledge that RCI has operating procedures in place (described in Attachment A) that are adequate to ensure that RCI is in compliance with the CPNI rules of the Federal Communications Commission. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules. *See Attachment A.*

The company has not taken any actions (*e.g.* instituted proceedings or filed petitions at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

A handwritten signature in black ink, appearing to read 'Michael Sauer', is written over a horizontal line.

Michael Sauer  
Executive Vice President  
Reliance Communications, Inc.

Date: February 26, 2009

**ATTACHMENT A**  
**STATEMENT OF CPNI COMPLIANCE PROCEDURES**

1. RCI primarily provides wholesale long distance calling services to other telecommunications carriers. The bulk of the wholesale long distance traffic carried by RCI is traffic that originates in the U.S. and terminates in India. In addition, RCI provides a limited amount of private line service between the U.S. and India. RCI started providing service in the U.S. in 2003.
2. RCI does not make available and has never made available to any affiliated or unaffiliated entity information that meets the definition of CPNI set forth in 47 U.S.C. § 222(h)(1), except in the provision of telecommunications service from which such CPNI is derived, the billing for such telecommunications service, or when required to do so by law.
3. RCI only uses CPNI to render, and bill for, the telecommunications services it provides to its customers. RCI does not use, and has never used, its customers' CPNI for any marketing purpose, either internal or external, or other purpose set forth in the FCC's CPNI Rules, 47 C.F.R. § 64.2001 *et seq.*
4. Upon receipt of a customer request, RCI will disclose to such customer that customer's own CPNI under specific circumstances. Prior to releasing CPNI in response to a customer-initiated request made over the phone, RCI verifies the customer's identity through a series of questions requesting specific account information that is not readily available to individuals other than the customer. In the case of a written request, such request must be sent from the customer's registered e-mail address.

5. All RCI personnel having access to CPNI have been instructed in the companies' policies governing CPNI. It is a violation of the policies of RCI to disclose CPNI outside of RCI, except in the provision of the telecommunications service from which such CPNI is derived, the billing for such telecommunications service, or when required to do so by law. Any employee that is found to have violated this policy will be subject to disciplinary action up to and including termination.
6. Access to CPNI at RCI is restricted to a limited number of employees and controlled through the use of active security and other measures, including the use of special passwords that are assigned on a limited basis and technological measures which prohibit the electronic reproduction or distribution of CPNI. Encryption and other security practices are utilized when CPNI is transmitted electronically. RCI has also adopted the PCI Data Security Standard, developed by the PCI Security Standards Council, for protecting against unauthorized external access to customer account information.
7. Strict controls are in place involving responses to law enforcement agencies that serve RCI with valid legal demands, such as a court ordered subpoena, for CPNI. RCI will not supply CPNI to any law enforcement agency that does not produce a valid legal demand.
8. Since RCI does not use CPNI for any purpose (other than to render, and bill for, the telecommunications services it provides to its customers), and does not, under any circumstances, provide CPNI to other entities (except in the provision of telecommunications service from which such CPNI is derived, the billing for such telecommunications service, or when required to do so by law), it has not implemented the prior notification and customer approval procedures set forth in the FCC's Rules for the use of CPNI.